



January 10, 2014

VIA ECF AND FACSIMILE (212-805-7986)

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Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Follow-up Request for Pre-Motion Conference
Schwartz v. Intimacy in New York et. al.
Case No. 13-CV-5735

Dear Honorable Judge Gardephe:

This firm represents the Defendants Intimacy in New York, LLC and Intimacy Management Company, LLC in the above-referenced action. Pursuant to the Telephone Conference conducted on December 2, 2013 and Rule 4A of Your Honor's Individual Rules of Practice, on December 9, 2013 Defendants submitted a request that the Court schedule a pre-motion conference and grant leave for Defendants to file a motion to bifurcate discovery. Plaintiffs are not consenting to such relief and Plaintiffs' counsel submitted a letter to the Court indicating same. To date, the parties have not received any response from the Court. Plaintiffs have served discovery demands on Defendants. At this time, Defendants respectfully request a pre-motion conference be scheduled, prior to responding to the due date of the response to Plaintiffs' discovery demands, which has been courteously extended by Plaintiffs to January 31, 2014.

We thank the Court for its attention to this matter.

Respectfully yours,

COZEN O'CONNOR

By: 
Vincent P. Pozzuto

VPP

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